

  
**KILPATRICK STOCKTON LLP**  
Joseph Petersen (JP 9071)  
Robert N. Potter (RP 5757)  
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Telephone: (212) 775-8700  
Facsimile: (212) 775-8800  
jpetersen@kilpatrickstockton.com  
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**SCANNED**

JUN 17 2008

James A. Trigg  
W. Andrew Pequignot  
1100 Peachtree Street, Suite 2800  
Atlanta, Georgia 30309-4530  
Telephone: (404) 815-6500  
Facsimile: (404) 815-6555

*Attorneys for Plaintiff Croomstacular Music Publishing, Inc.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CROOMSTACULAR MUSIC  
PUBLISHING, INC.

Plaintiff,

v.

ELEMENT 9 RECORDINGS, LLC,  
d/b/a ELEMENT 9 HIP HOP,  
MINDER MUSIC, INC. d/b/a  
TAKING CARE OF BUSINESS  
MUSIC, and STUART PFLAUM,  
Individually.

Defendants.

Case No.: 08 cv 4576 (WHP) (JCF)

**MOTION TO ADMIT W. ANDREW PEQUIGNOT *PRO HAC VICE***

This Motion for Admission to Practice *Pro Hac Vice* is filed pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of

New York. The undersigned counsel, a member of the Bar of this Court, hereby moves this Court for an Order allowing the admission *pro hac vice* of:

W. Andrew Pequignot  
**KILPATRICK STOCKTON LLP**  
1100 Peachtree Street, Suite 2800  
Atlanta, Georgia 30309-4530  
Phone: (404) 815-6500  
Fax: (404) 815-6555  
Email address: APequignot@kilpatrickstockton.com

W. Andrew Pequignot is a member in good standing of the Bar of the State of Georgia.

There are no pending disciplinary proceedings against W. Andrew Pequignot in any State or Federal court.

Dated: New York, New York  
June 16, 2008

**KILPATRICK STOCKTON LLP**



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Defendants.

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**AFFIDAVIT OF JOSEPH PETERSEN IN SUPPORT OF MOTION  
TO ADMIT W. ANDREW PEQUIGNOT PRO HAC VICE**

STATE OF NEW YORK )  
                      ) ss:  
COUNTY OF NEW YORK )

Joseph Petersen, being duly sworn, hereby deposes and says as follows:

1. I am a partner at the law firm of Kilpatrick Stockton LLP, 31 West 52<sup>nd</sup> Street, New York, New York 10019, counsel for Plaintiff Croomstacular Music Publishing, Inc. ("Croomstacular"), in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Croomstacular's motion to admit as counsel W. Andrew Pequignot *pro hac vice* to represent Croomstacular.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known W. Andrew Pequignot for well over a year.

4. Mr. Pequignot is an associate at the law firm of Kilpatrick Stockton LLP, 1100 Peachtree Street, Suite 2800, Atlanta, Georgia 30309-4530.

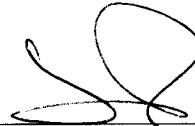
5. I have found Mr. Pequignot to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of W. Andrew Pequignot, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of W. Andrew Pequignot, *pro hac vice*, which is attached hereto as Exhibit A.

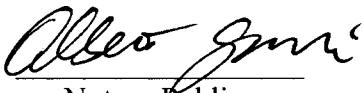
WHEREFORE it is respectfully requested that the motion to admit W. Andrew Pequignot, *pro hac vice*, to represent Croomstacular in the above captioned matter, be granted.

Respectfully Submitted,



Joseph Petersen

Sworn to before me this  
16<sup>th</sup> day of June, 2008



Notary Public

ALBERTO J. GARCIA  
Notary Public, State of New York  
No. 01GA6053013  
Qualified in New York County  
Commission Expires January 29, 2011



# STATE BAR OF GEORGIA

*Lawyers Serving the Public and the Justice System*

Mr. William Andrew Pequignot  
Kilpatrick Stockton LLP  
1100 Peachtree St., N.E., Suite 2800  
Atlanta, GA 30309-4530

**CURRENT STATUS:** Active Member-Good Standing  
**DATE OF ADMISSION:** 11/14/2006  
**BAR NUMBER:** 424546  
**TODAY'S DATE:** June 4, 2008

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



## STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

### HEADQUARTERS

104 Marietta Street, Suite 100  
Atlanta, Georgia 30303  
(404) 527-8700 ■ (800) 334-6865  
FAX (404) 527-8717  
[www.gabar.org](http://www.gabar.org)

### SOUTH GEORGIA

244 E. Second Street (Zip 31794)  
P.O. Box 1390  
Tifton, Georgia 31793-1390  
(229) 387-0446 ■ (800) 330-0446  
FAX (229) 382-7435

# EXHIBIT A

**KILPATRICK STOCKTON LLP**

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Defendants.

Case No.: 08 cv 4576 (WHP) (JCF)

**ORDER FOR ADMISSION *PRO HAC VICE* OF W. ANDREW PEQUIGNOT  
ON WRITTEN MOTION**

Upon the motion of Joseph Petersen, attorney for Plaintiff Croomstacular Music Publishing, Inc. ("Croomstacular"), and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

W. Andrew Pequignot  
**KILPATRICK STOCKTON LLP**  
1100 Peachtree Street, Suite 2800  
Atlanta, Georgia 30309-4530  
Phone: (404) 815-6500  
Fax: (404) 815-6555  
Email address: APequignot@kilpatrickstockton.com

is admitted to practice *pro hac vice* as counsel for Croomstacular in the above captioned action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nys.uscourts.gov](http://nys.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: June \_\_\_\_\_, 2008  
New York, New York

SO ORDERED,

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U.S.D.J.

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Defendants.

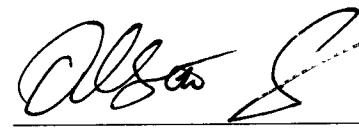
**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2008, a true and correct copy of the following documents:

- a) Motion to Admit James A. Trigg Pro Hac Vice with supporting papers; and
- b) Motion to Admit W. Andrew Pequignot Pro Hac Vice with supporting papers;

were served by first class mail, postage fully prepaid upon the following:

Partha P. Chattoraj, Esq,  
Markowitz & Chattoraj LLP  
271 Madison Avenue, 20th Floor  
New York, New York 10016



Alberto Garcia